EMERGENCY HAZARDOUS WASTE PERMIT

Permit #ILE 200000074

ISSUED TO:

- 1. Aldens (Owner)
- 2. Petrochem Services, Inc., Lemont, IL (Operator)

EXPIRATION DATE: October 24, 1983

PURPOSE:

To mitigate a threat to human health or the environment caused by hazardous waste abandoned by Film Recovery Systems Corporation et al at several locations within Illinois.

LOCATION:

5000 West Roosevelt, Chicago, Illinois

ACTIONS AUTHORIZED:

Treatment of cyanide bearing reactive hazardous waste to reduce the level of soluble cyanide by use of the standard alkaline chlorination process.

METHOD:

Waste film will be resuspended in water, to which sodium hydroxide and sodium hypochlorite will be added as described in Exhibit A of Attachment 2. Contaminated equipment and buildings will be treated by application of caustic sodium hypochlorite solution as described in Exhibit A of Attachment 2. Analytical monitoring will be performed as described in Exhibit B of Attachment 2.

WASTES:

- 1. Approximately 16,000,000 pounds of exposed photographic film chips contaminated with cyanide.
- 2. Approximately 15,000 gallons of surface water contaminated with cvanide.
- 3. An indeterminate quantity of cyanide contamination in or on trailers, buildings, and equipment used to store and handle the wastes described above.



4. Other materials may be treated under this permit, upon receipt of U.S. EPA approval.

GENERAL CONDITIONS:

- 1. 40 CFR 270.2 Definitions
- 2. 40 CFR 270.30 Conditions Applicable to All Permits
- 3. 40 CFR 270.32 Establishing Permit Conditions
- 4. 40 CFR 270.4 Effect of a Permit
- 5. 40 CFR 270.40 Transfer of Permits
- 6. 40 CFR 270.12 Confidentiality of Information
- 7. 40 CFR 264.4 Immiment Hazard Action
- 8. 40 CFR 264.12(c) Required Notices
- 9. 40 CFR 264.13(a)(1) & (2) General Waste Analysis
- 10. 40 CFR 264.14 Security
- 11. 40 CFR 264.15(a) & (c) General Inspection Requirements
- 12. 40 CFR 264.194(a)(4) & (5) Inspections (Tanks)
- 13. 40 CFR 264.17 General Requirements for Ignitable, Reactive and Incompatible Waste
- 14. 40 CFR 264.198(a) Special Requirements for Ignitable or Reactive Waste (Tanks)
- 15. 40 CFR 264.31 Design and Operation of Facility
- 16. 40 CFR 264.32 (c) & (d) Required Equipment
- 17. 40 CFR 264.33 Testing and Maintenance of Equipment
- 18. 40 CFR 264.34 Access to Communications or Alarm System
- 19. 40 CFR 264.55 Emergency Coordinator
- 20. 40 CFR 264.56 Emergency Procedures
- 21. 40 CFR 264.73(a) & (b)(1) Operating Record
- 22. 40 CFR 264.74 Availability, Retention and Disposition of Records
- 23. 40 CFR 264.77 Additional Reports
- 24. 40 CFR 264.111 Closure Performance Standard
- 25. 40 CFR 264.114 Disposal or Decontamination of Equipment
- 26. 40 CFR 264.197 Closure (Tanks)
- 27. 40 CFR 264.192 General Operating Requirements (Tanks)

SPECIAL CONDITIONS:

- 1. The operator shall comply with all provisions of the Court Orders in People of the State of Illinois vs Film Recovery Systems Corporation et al., Circuit Court of Cook County, No. 83 CH 3812, dated May 25, 1983 and June 17, 1983. Said Orders are included herein as Attachments Number 1 and 2.
- 2. The operator shall comply with all applicable DOT regulations.
- 3. The operator shall comply with 35 Illinois Administrative Code Parts 722 and 723, as applicable.

- 4. The operator shall notify U.S. EPA within 72 hours of any determination that the treatment process has failed to achieve the goals stated under METHOD above. The operator may employ a alternative methods of treatment upon written U.S. EPA approval.
- 5. Since Aldens participation in this permitted activity is for the convenience of the State of Illinois, the State of Illinois assumes the responsibilities under this permit which would normally accrue to the owner of the site.

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